

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

FILED

JUL 18 2019

U.S. DISTRICT COURT
EASTERN DISTRICT OF MO
ST. LOUIS

UNITED STATES OF AMERICA,

Plaintiff,

v.

EDDIE EARL JOHNSON, III,

Defendant.

4:19CR562 CDP/NAB

REQUEST FOR PRE-TRIAL DETENTION AND HEARING

Comes now the United States of America, by and through its Attorneys, Jeffrey B. Jensen, United States Attorney for the Eastern District of Missouri, and Jason Dunkel, Assistant United States Attorneys for said District, and moves the Court to order Defendant detained pending trial, and further requests that a detention hearing be held three (3) days from the date of Defendant's initial appearance before the United States Magistrate pursuant to Title 18, United States Code, Section 3141, et seq.

As and for its grounds, the United States of America states as follows:

1. Defendant is charged with possessing a machinegun, in violation of Title 18, United States Code, Section 922(o).
2. In the instant case, Defendant sought to acquire at least 14 devices capable of converting a semiautomatic firearm into a fully automatic firearm. Police have not recovered all of the devices that Defendant acquired or sought to acquire.
3. The number of devices sought by the Defendant gives rise to concerns that the Defendant was trafficking in machineguns.
4. Machineguns are inherently more dangerous than semiautomatic firearms. This, combined with the fact that police have not been able to recover all machineguns, heightens the

concerns of the safety of the community if the Defendant were to be released on bond.

5. Pursuant to Title 18, United States Code, Section 3142(g),
 - (a) the nature and circumstances of the offense charged;
 - (b) the weight of the evidence against defendant;
 - (c) the defendant's history and characteristics; and
 - (d) the nature and seriousness of the danger to any person or the community that would be posed by defendant's release;

warrant defendant's detention pending trial.

WHEREFORE, there are no conditions or combination of conditions that will reasonably assure defendant's appearance as required and the safety of any other person and the community and the Government requests this Court to order Defendant detained prior to trial, and further to order a detention hearing three (3) days from the date of Defendant's initial appearance.

Respectfully submitted,

JEFFREY B. JENSEN
United States Attorney

s/Jason S. Dunkel
JASON S. DUNKEL, #65886MO
Assistant United States Attorney